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Court Appointed Class Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

REBEKAH BAHARESTAN and JENA MCINTYRE, on behalf of themselves and all others similarly situated,

Plaintiffs,

V.

**VENUS LABORATORIES, INC., dba EARTH
FRIENDLY PRODUCTS, INC.**

Defendant.

Case No. 3:15-cv-03578-EDL

**DECLARATION OF REBEKAH
BAHARESTAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
AWARD OF ATTORNEYS' FEES,
AND REIMBURSEMENT FOR COSTS
AND SERVICE AWARDS**

Date: March 15, 2016
Time: 9:00 a.m.
Location: Courtroom 5, 15th Floor
Judge: Hon. Elizabeth D. Laporte

[Filed concurrently with Declarations of Melissa W. Wolchansky, Mark N. Todzo, Jena McIntyre, and Jeffrey D. Dahl; and Notice of Motion and Motion for Award of Attorneys' Fees, and Reimbursement for Costs and Service Awards]

1 I, Rebekah Baharestan, declare as follows:

2 1. The statements made in this Declaration are based on my personal knowledge and,
3 if called as a witness, I could and would testify thereto.

4 2. I am a named Plaintiff in this class action. This Declaration is given in support of
5 my request that the Court award attorney fees to class counsel, reasonable costs, and service
6 awards in this class settlement.

7 3. I am a citizen of California and reside in Marin County, California.

8 4. I brought this action against Earth Friendly Products (“EFP”) because EFP
9 deceptively represented its Dishmate and Laundry Detergent Products to be natural, naturally
10 derived, made from plants, and safer alternatives to traditional detergents, when in fact those
11 products contain methylisothiazolinone (“MI”), an unnatural chemical to which I and a significant
12 percentage of consumers are now permanently allergic due to exposure to the Isothiazolinone
13 family of chemicals of which MI is a member.

14 5. Having seen EFP’s representations and unwittingly purchased EFP’s products
15 containing MI, I contacted counsel from Lexington Law Group and sought their assistance in
16 ending EFP’s practice of marketing products containing MI as natural, naturally derived, made
17 from plants, and safer alternatives.

18 6. I have spent significant time on this case. I have consulted with my counsel, by
19 telephone and in person, to discuss my experience with EFP products and with MI. I have
20 reviewed, discussed, and helped determine the actions to be taken and decisions to be made in
21 pursuit of this case on behalf of all class members.

22 7. Throughout these proceedings, I have been willing to be deposed and/or to testify
23 in court proceedings if called upon to do so.

24 8. Based on my interactions and relationship with my counsel, I believe my counsel
25 has fairly and adequately represented the class and will continue to do so.

26 9. I understand that, as a class representative, I have an obligation to assert and protect
27 the interests of other class members and not act just for my own personal benefit. I do not have
28

1 any conflict with other class members. I have done my best to protect the interests of other class
2 members and fairly and adequately to represent the class to the best of my ability.

3 10. My counsel have procured a settlement of this action on a class-wide basis, which I
4 have approved.

5 11. I request that the Court approve the award of attorneys' fees to my counsel and the
6 service award to me as class representative.

7 I declare under penalty of perjury under the laws of the United States that the
8 foregoing is true and correct.

9 Executed on January 15, 2016, at San Rafael, California.

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11 _____
12 REBEKAH BAHARESTAN

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